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DOES NOT CONTAIN CBI

3M Environmental, Health and Safety Operations

3M Center, Building 0224-05-W-03
St. Paul, MN 55144-1000

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Certified Mail

April 22, 2013

NO CBI

Document Processing Center
EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics, U.S. EPA
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

Re: TSCA 8(e) Substantial Risk Notice on perfluoroisobutyryl fluoride; CAS 677-84-9

To whom it may concern:

3M recently generated data in an acute inhalation toxicity study in rats on perfluoroisobutyryl fluoride (CAS 677-84-9) suggesting the 4 hour LC50 of this chemical is less than 200 ppm.

A brief summary of the study is as follows:

> Male Sprague-Dawley rats were exposed, whole body, to 800 ppm (v/v) (N=3) and 400 ppm (v/v) (N=3) on Study Day 1. Control animals were placed in a separate chamber and treated in the same manner except for the addition of test material. Observations were made continuously throughout the exposures. On the afternoon of Day 2 post-exposure, one test animal from each dose group was found deceased. The remaining test animals were euthanized in extremis by CO2 asphyxiation. All control animals were also euthanized by CO2 asphyxiation for lung comparison and gross necropsies were performed on all control and test animals. The lungs of all six test animals appeared red, mottled, and 3/6 sets of lungs were (2 from 400 ppm dose level and 1 from the 800 ppm dose level) filled with white foamy liquid when compared to the controls, whose lungs appeared normal. There were no gross lesions noted. There were statically significant differences in the individual lung weights and individual body weight gains/losses in the 800 ppm dose level group when compared to the control group. There was a statistically significant difference in individual body weight gains/losses in the 400 ppm dose level group when compared to the control group. Based on the data produced in this study, the 4 hr LC50 is estimated to be < 200ppm.

If you have any questions or would like any additional information, please contact Deanna Luebker, 3M TSCA 8(e) Coordinator, at (651) 737-1374 or djluebker@mmm.com.

Sincerely,

Jean B. Sweeney (DL)

Jean B. Sweeney
Staff Vice President, 3M Environmental, Health and Safety Operations

CONTAINS NO CBI

Deanna Luebker, PhD
CT&RS 220 6E 03
651 737 1374

3M General Offices
3M Center
St Paul, MN 55144-1000

7010 1670 0000 0225 2939